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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MILANO MANHATTAN, LTD.,	:	07 Civ. 8011 (NRB)
	:	
Plaintiff,	:	
	:	<u>PLAINTIFF'S INITIAL</u>
against	:	<u>DISCLOSURES</u>
	:	
FILENE'S BASEMENT and NYCAL INC., D/B/A	:	
SERENADE,	:	
	:	
Defendants.	:	
	:	
-----	X	
NYCAL, INC., d/b/a SERENADE,	:	
	:	
Third Party Plaintiff,	:	
	:	
against	:	
	:	
PRATO TEXTILE,	:	
	:	
Third Party Defendant.	:	
	:	
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Plaintiff Milano Manhattan, Ltd. ("Milano"), by its attorneys Herrick, Feinstein LLP, as and for its initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1), states as follows based upon information that is presently reasonably available to it. Plaintiff reserves the right to supplement

these disclosures if it determines that there are other individuals or documents that are responsive hereto.

1. Pursuant to Fed. R. Civ. P. 26(a)(1)(A), Plaintiff names the following individuals as possessing information that may be relevant to the case, and whom Plaintiff may call to support its claims and/or defenses at trial:

(a) Paula Clerigo, an employee of Plaintiff, possesses information concerning the creation and design of Plaintiff's copyrighted design (the "Copyrighted Design").

Paula Clerigo
c/o Herrick, Feinstein LLP
2 Park Avenue
New York, New York 10016

(b) Jack Yadidi, a principal of Plaintiff, possesses information concerning the registration of the Copyrighted Design with the US Copyright Office; the manufacture and sale of apparel containing the Copyrighted Design.

Jack Yadidi
c/o Herrick, Feinstein LLP
2 Park Avenue
New York, New York 10016

(c) One or more representatives of Defendants Filene's and NYCAL Inc., and Third-Party Defendant Prato Textile, whose identities are not yet known but will be ascertained through discovery and through Defendants' and Third-Party Defendant's Initial Disclosures. Such individuals will have knowledge of (i) Defendants' and Third-Party Defendant's sales of goods incorporating the Copyrighted Design, (ii) the design and creation of the goods sold by Defendants that incorporated designs that infringed, and may still be infringing, the Copyrighted Design, and (iii) Defendants' and Third-Party Defendant's earnings and profits from the sales of infringing goods (to the extent relevant to assess statutory damages).

2. Pursuant to Fed. R. Civ. P. 26(a)(1)(B), Plaintiff identifies the following categories of documents that Defendant may use to support its claims or defenses: (i) the copyright registration for the Copyrighted Design issue by the U.S. Copyright Office; (ii) design drawing and other specimen used to create the Copyrighted Design; and (iii) documents concerning the sales of goods incorporating the Copyrighted Design (subject to any election by Plaintiff to seek statutory damages that may render such documents irrelevant). The foregoing documents are located at the offices of Plaintiff or its counsel. In addition, Plaintiff anticipates that certain documents that are exclusively within the possession, custody and control of Defendants will be used to support its claims.

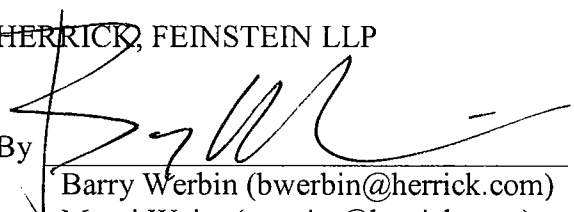
3. Pursuant to Fed. R. Civ. P. 26(a)(1)(C), Plaintiff requests statutory damages up to a maximum of \$150,000 under 17 U.S.C. § 504(c) for willful infringement and attorney's fees, which cannot be specified at this time.

4. Pursuant to Fed. R. Civ. P. 26(a)(1)(D), Plaintiff states that it is unaware of any policy of insurance referenced in the Rule that has any applicability in this action.

Dated: January 10, 2008

HERRICK, FEINSTEIN LLP

By

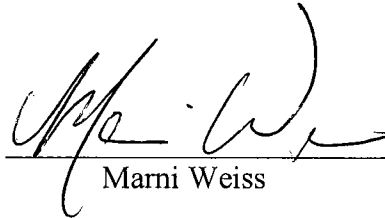

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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the United States District Court for the Southern District of New York on this 10th day of January, 2008, with notice of case activity generated and sent electronically to:

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